

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:)	Case No. 21-12219
)	
Sara R Hughes,)	Judge Arthur I. Harris
)	
Debtor.)	Chapter 7 Case

**MOTION OF TRUSTEE FOR ORDER DIRECTING DEBTOR
TO TURN OVER PROPERTY OF THE ESTATE**

David O. Simon, trustee in this case, respectfully moves the Court for the entry of an Order directing the debtor to turn over property of the estate and, in support of this motion, states as follows:

1. This case was commenced by the filing of a voluntary petition for relief under Chapter 7 of the Bankruptcy Code on June 26, 2021.

2. At the time of the commencement of this bankruptcy case the debtor was entitled to receive income tax refunds from the Internal Revenue Service in the amount of \$4,692.00 and the State of Ohio in the amount of \$520.00.

3. The non-exempt portion of the debtor's income tax refunds is the amount of \$1,659.00, which is property of this estate pursuant to the provisions of §541 of the Bankruptcy Code and is subject to turnover pursuant to the provisions of §542 of the Bankruptcy Code.

WHEREFORE, the trustee prays that this motion be granted and that the debtor be directed to turn over to the trustee the sum of \$1,659.00, representing her non-exempt 2020 income tax refunds at such time as they are received from the respective taxing authorities.

/s/ David O. Simon
David O. Simon, Trustee
3659 Green Road, Suite 106
Beachwood, OH 44122-5715
(216) 621-6201; Fax: (888) 467-4181
david@simonlpa.com

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Motion of Trustee for Order Directing Debtor to Turn Over Property of the Estate was electronically served upon Mark Franklin Graziani, Esq., attorney for debtor, at mark_graziani@yahoo.com and was sent by regular U.S. Mail this 29th day of July, 2021, to:

Sara R. Hughes
6980 Big Creek Parkway
Middleburg Heights, OH 44130

/s/ David O. Simon
David O. Simon